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**Attorneys for Plaintiffs** UMG Recordings, Inc.; Capitol Records, LLC; Concord Bicycle Assets, LLC; CMGI Recorded Music Assets LLC; Sony Music Entertainment; and Arista Music

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

UMG RECORDINGS, INC., CAPITOL  
 RECORDS, LLC, CONCORD BICYCLE  
 ASSETS, LLC, CMGI RECORDED MUSIC  
 ASSETS LLC, SONY MUSIC  
 ENTERTAINMENT, and ARISTA MUSIC

Plaintiff(s),

vs.

INTERNET ARCHIVE, BREWSTER  
 KAHLE, KAHLE/AUSTIN FOUNDATION,  
 GEORGE BLOOD, and GEORGE BLOOD,  
 L.P.

Defendant(s).

Case No.: 3:23-cv-06522-MMC

**PLAINTIFFS' MOTION FOR  
 EXTENSION OF TIME TO OPPOSE  
 DEFENDANTS' MOTIONS TO DISMISS  
 (First Request)**

Pursuant to Civil Local Rule 6-3 and Section 7 of the Court's Standing Orders, Plaintiffs UMG Recordings, Inc., Capitol Records, LLC, Concord Bicycle Assets, LLC, CMGI Recorded Music Assets LLC, Sony Music Entertainment, and Arista Music ("collectively, "Plaintiffs"), by and through their attorneys, move to extend by fourteen days, from February 9, 2024 to February 23, 2024, the time for Plaintiffs to oppose Defendants Internet Archive, Kahle, Blood, and George Blood L.P.'s Motion to Dismiss, ECF No. 75, Defendants Internet Archive, Kahle, Blood, and George Blood L.P.'s Request for Incorporation of Documents by Reference and for Judicial Notice in Support of Their Motion to Dismiss, ECF No. 76, and Defendant Kahle/Austin Foundation's Motion to Dismiss, ECF No. 78 ("Defendants' Rule 12 Motions").

As explained in detail in the accompanying Declaration of Corey Miller, the contents of which are incorporated by reference in this Motion, Plaintiffs request satisfies Local Rule 6-3's requirements for an order enlarging time. *See* Decl. of Corey Miller in Supp. of Pls.' Mot. For Extension of Time to Oppose Defs.' Mots. To Dismiss ("Miller Decl."). Plaintiffs need additional time to respond to three motions Defendants have filed. *Id.* ¶ 3. Plaintiffs will suffer prejudice if they have only two weeks to respond to Defendants' Rule 12 Motions, which Defendants have had five months to prepare. *Id.* ¶ 4. Plaintiffs actively sought a stipulation from Defendants to the proposed extension, but Defendants refused, even when Plaintiffs offered reciprocally extend Defendants' time to reply. *Id.* ¶ 5. This is Plaintiffs' first request for an extension of time to file oppositions to Defendants' Rule 12 Motions, and the requested extension will not affect the schedule for the case. *Id.* ¶¶ 6-7.

Accordingly, Plaintiffs have shown good cause, and the Court should grant Plaintiffs' motion for extension of time.

Dated: January 31, 2024

Respectfully submitted,

/s/ Corey Miller

Matthew J. Oppenheim

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